TENNESSEE REGULATORY AUTHORITY

Melvin Malone, Chairman Lynn Greer, Director Sara Kyle, Director



460 James Robertson Parkway Nashville, Tennessee 37243-0505

March 23, 2000

Parties of Record

RE: Petition to Convene a Contested Case Proceeding to Establish Permanent Prices for Interconnection and Unbundled Network Elements Docket No. 97-01262

Pursuant to the TRA's Interim Order on Phase I (January 25, 1999) and Order for Reconsideration and Clarification of Interim Order on Phase I (November 3, 1999) BellSouth and AT&T filed on December 1, 1999 revised cost studies.

BellSouth and AT&T/MCI provided cost studies supporting proposed prices for unbundled network elements. However, the Authority requests that BellSouth and AT&T/MCI provide the following to the TRA and other parties of record by March 31, 2000, 12:00 noon:

- 1. The attached list completed with each party's proposed cost for each element.
- 2. Where the cost is not available for an element, explain the reason.
- 3. For the following adjustments as suggested by AT&T in the BellSouth TELRIC Calculator, each party is invited to identify each UNE whose cost is affected by each adjustment:
 - a. Use of 100% integrated digital loop carrier and 0% universal digital loop carrier.
 - b. Use of 100-foot drop length for labor contract burial and installation cost.
 - c. Provision of loop-switching combinations.
 - d. Removing all separate charges for vertical features.

In addition, the Authority requests that BellSouth provide the following:

- 1. Explain precisely Attachment 2, F.1.1 OSS Electronic Interface Cost, per UNE; especially the derivation of the 2.5 Average Number of UNEs Per Order and the 2.9 Churn Factor.
- 2. Do BellSouth retail operations use or benefit from any OSS systems? If so, how? If no, explain why.



3. Clarify the derivation of the distribution of DLC provided in its footnote 1 in the Reply Comments to explain the split of 21.28% UDLC and 44% Copper, specifically explain why the sum of universal DLC and Copper does not add to 100%.

Should you have any questions regarding this request, please contact Aster Rutibabalira 741-2904, ext. 155.

Sincerely,

David Waddell Executive Secretary

Attachment

cc: Counsel for other Parties of Record

Guy M. Hicks, Esquire BellSouth Telecommunications, Inc. Suite 2101 333 Commerce Street Nashville, TN 37201-3300

R. Douglas Lackey Bennett L. Ross 675 W. Peachtree St., NE., Suite 4300 Atlanta, GA 30375

James P. Lamoureux AT&T 1200 Peachtree St., NE, #4068 Atlanta, GA 30367

Charles B. Welch, Jr., Esquire Farris, Mathews, Gilman, Branan & Hellen, P.L.C. 511 Union Street, Suite 2400 Nashville, TN 37219 (Letter only)

Richard Collier, Esquire Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0500 (Letter only)

Henry Walker, Esquire Boult, Cummings, et al. 414 Union Avenue, #1600 P.O. Box 198062 Nashville, TN 39219-8062 (Letter only)

Dana Shaffer, Esquire NEXTLINK 105 Malloy Street, #300 Nashville, TN 37201 (Letter only)

Jonathan E. CAnis Enrico C. Soriano Kelley, Drye & Warren LLP 1200 19th St., NW, Ste.500 Washington, DC 20036 (Letter only) James Wright, Esquire United Telephone – Southeast 14111 Capitol Blvd. Wake Forest, NC 27587 (Letter only)

Jon E. Hastings, Esquire Boult, Cummings, et al. 414 Union St., #1600 Nashville, TN 37219 (Letter only)

Val Stanford, Esquire Gullett, Sanford, Robinson & Martin 230 Fourth Ave., N. 3d Fl. Nashville, TN 37219-8888 (Letter only)

Vincent Williams, Esquire Office of the Attorney General Consumer Advocate Division 426 Fifth Ave. N., 2nd Fl. Nashville, TN 37243-0500 (Letter only)

H. LaDon Baltimore, Esquire Farrar & Bates, L.L.P. 211 Seventh Ave., N., #320 Nashville, TN 37219-1823 (Letter only)

Kenneth Bryant, Esquire Trabue, Sturdivant & DeWitt 511 Union St., #2500 Nashville, TN 37219-1738 (Letter only)

William C. Carriger, Esquire Strang, Fletcher, et al. One Union Square, #400 Chattanooga, TN 37402 (Letter only)